

REMARKS

Applicant respectfully requests reconsideration of this application in view of the foregoing amendments and the following remarks.

CLAIM STATUS

Claims 1-19 are pending and rejected. Claims 1, 7, 13 and 19 are independent in form and herein amended. No new matter has been added by these amendments.

Independent Claims 1, 7, 13 and 19

Claims 1-19 are rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. 2002/0067412 to Kawai et al. (“Kawai”) in view of US Patent 6,266,085 to Kato et al (“Kato”).

In rejecting claims 1, 7, 13 and 19 the Examiner has taken the position that the present invention is obvious in view of the combination of Kawai and Kato. The Examiner maintains that all the elements of claim 1 other than the designation device are disclosed by Kawai. The Examiner further contends that Kato teaches the designation device claim element, which the Examiner admits to be missing from Kawai. Claims 7, 13 and 19 have been rejected for similar reasons.

While the technical scope of the cited prior art and the present invention may arguably be similar, Applicants do not agree with the Examiner’s assertion that the present invention is anticipated by Kawai or obvious over Kawai in view with Kato.

Both Kawai and the present invention can be described as being directed to a camera control system for controlling a plurality of cameras, where a map showing the positions

of the various cameras is included. Sensed images are fed back to be viewed by a user. Under both systems, the user may use a pointing device to operate an icon for a particular camera on the map for the purpose of controlling that camera's operation remotely. Additionally, both Kato and the present invention teach selecting a new camera position using a mouse.

However, Applicants believe there are differences between the systems that distinguish the claimed invention from Kawai and Kato individually and/or in combination.

Applicants believe that the present claimed invention is different from Kato and Kawai, separately or combined, at least in the way the area to be sensed is designated on the map. As shown in Figure 6 of the present invention, the use of the designation device to designate an area to be sensed is very flexible, and indeed different from the designation device described in Kato. For example, the designation device in the present invention allows direct designation of an arbitrary size, shape and position of a new image sensing area that is independent of the current image sensing area. This capability is clearly lacking in Kato.

While a correct interpretation of the claimed designation device as recited in the pending claims would include aspects of the foregoing functionality, Applicants amend the claims to explicitly recite the flexibility of the described designation device. Thus, the amended claims clearly differentiate the present invention from Kato by explicitly reciting aspects of the designation device that are not taught or suggested in Kato. For example, according to the present invention as claimed a user can freely designate on the map the size, shape and position of a new area to be monitored that is independent of the current image sensing area. The designation can be performed by, for instance, drawing a freehand line on the map as shown in

Figure 6. In Kato, such flexibility does not exist and the shape of the designated image sensing area is limited to having a rectangular shape. See Figure 2 in Kato. Furthermore, unlike Kato where the size and position of the designated image sensing area is restricted to the “potential maximum imaging visual field 42” and where the designated image sensing area must relate to the current imaging visual field 44 (Figure 2 in Kato), the present invention does not have such restrictions on the designated sensing area.

The designation device according to the present invention is much more flexible than Kato, and is neither taught nor suggested by Kato or Kawai, separately or combined.

Applicants respectfully submit that claims 1, 7, 13 and 19 are neither taught nor suggested, and thus neither anticipated by nor rendered obvious in view of Kato and Kawai, taken individually or combined.

Dependent Claims:

Applicants have not independently addressed the rejections of the dependent claims because Applicants submit that, as the independent claims from which the dependent claims depend are allowable for at least the reasons discussed *supra*, the dependent claims are allowable for at least similar reasons. Applicants, however, reserve the right to address such rejections should such response be necessary and appropriate.

Accordingly, Applicant respectfully submits that claims 1-19 as amended herein are allowable over the prior art of record, taken alone or in combination for at least the reasons stated, and that the respective rejections be withdrawn. Applicants further submit that the application is hereby placed in condition for allowance which action is earnestly solicited.

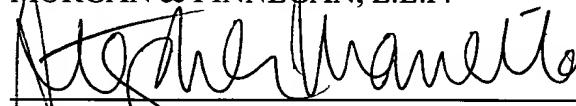
CONCLUSION

In view of the foregoing, Applicants respectfully request reconsideration and allowance of this application.

Applicants believe no fees are required for this Amendment and that no extension of time is required for this filing. However, should an extension of time be necessary to render this filing timely, such is hereby petitioned, and the Commissioner is hereby authorized to charge any additional fees which may be required for this paper, or credit any overpayment, to Deposit Account No. 13-4500, Order No. 1232-4564.

In the event that a telephone conference would facilitate prosecution, the Examiner is invited to contact the undersigned at the number provided.

Respectfully submitted,
MORGAN & FINNEGAN, L.L.P.


Stephen J. Manetta
Registration No. 40,426

Dated: December 15, 2003 By:

Correspondence Address:
Morgan & Finnegan, L.L.P.
345 Park Avenue
New York, NY 10154
(212) 758-4800 (Telephone)
(212) 751-6849 (Facsimile)